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January 18, 2017

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Dear Pat and Anne,

On behalf of Big Ox, thank you for your e-mail response on January 10th to our response on the Clean Water Act ("CWA") information request, as well as your letter on January 13th in response to our response on the Clean Air Act ("CAA") information request. Our objective is to reach a mutual understanding, working with you on all of the procedural and factual considerations in a constructive and efficient dialogue. To that end, we appreciate our conference call with you on January 4th. On that call you indicated that EPA concurred with us providing an initial response to the CAA information request by January 10th, and was fine with providing more time for a fuller responses. We were therefore timely in our submittal of our initial response to the CWA request on January 6th and the CAA request on January 10th.

KELLEY DRYE & WARREN LLP

Patricia Miller
Anne Rauch
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As we discussed and agreed to on our call, Big Ox will provide several ongoing responses to the two information requests on a rolling basis as soon as relevant and appropriate responses become available through our ongoing document searches. Pursuant to our prior discussions, we plan to fully comply with both requests by the January 27th deadline, specified in your letter on January 13th. We will also try to provide you with some interim documents prior to January 27th.

Big Ox will provide the available records it is required to keep and the records it deems are reasonable for EPA to request, pursuant to EPA's statutory authority. We have carefully read your January 13th letter and continue to believe that the more than 20 questions *incorrectly* assume that the Big Ox facility exceeds the regulatory thresholds for hydrogen sulfide and other pollutants of the Risk Management Program ("RMP") established under Section 112(r). Big Ox's preliminary calculations estimate that the amounts of methane and hydrogen sulfide present at the facility are substantially below the RMP threshold of 10,000 pounds for both hydrogen sulfide and for methane. We will provide you on or before January 27th with corresponding documentation.

* * *

We are continuing to diligently search for responsive information and will provide documents and data to EPA in accordance with the timeframe outlined above. We plan on certifying our answers to the EPA information requests once we understand what information EPA needs and is entitled to, and once our responses are complete. Please let us know if you have any questions. On behalf of Big Ox we look forward to working with you to address all EPA's issues and questions.

Best regards,



William M. Guerry
Jonathan K. Cooperman